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NICHOLAS M. PORRAS, ESQ. 1 Nevada Bar No.: 12849 2 201 West Liberty Street, Suite 207 Reno, NV 89501 3 Attorney for Defendants MADISON MANAGEMENT SERVICES, 4 LLC, WALDMAN AND PORRAS, PLLC 5 6 7 UNITED STATES DISTRICT COURT 8 DISTRICT OF NEVADA 9 LISA A. BRYANT, 10 Case No.: 2:20-cv-00594-CDS-EJY 11 Plaintiff, 12 v. 13 Stipulation for an Extension of Time to MADISON MANAGEMENT SERVICES. File a Joint Pretrial Order 14 LLC, and WALDMAN & PORRAS, PLLC, 15 Defendants. [SECOND REQUEST] 16 17 18 Plaintiff Lisa Bryant and Defendants Madison Management Services, LLC, and Waldman 19 & Porras, PLLC, (collectively known as the "Parties) hereby submit the following Stipulation for 20 an extension of time for the Parties to file the Joint Pretrial Order. There are many potential 21 exhibits at issue in this matter and the parties need additional time to confer with clients and 22 23 opposing sides to minimize court involvement in issue regarding admissibility. In addition, recent 24 filings of potential dispositive pleadings have altered trial strategy. Finally, the parties are seeking 25 guidance as to potential trail dates. This extension is requested in good faith and is not for purposes 26 of delay or prejudice to any party. 27 28

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1	THEREFORE, the Parties hereby stipulate and stipulate and agree to extend the deadling	
2	to file the Joint Pretrial Order to June 8, 2022.	
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7	IT IS SO STIPULATED.	
8	DATED: May 12, 2022	DATED: May 12, 2022
10	FREEDOM LAW FIRM	WALDMAN & PORRAS, PLLC
11 12 13 14 15 16 17 18 19 20 21	By: /s/ George Haines GEORGE HAINES, ESQ. Nevada Bar No.: 9411 8985 S. Eastern Ave., Suite 350 Las Vegas, NV 89123 Attorney for Plaintiff LISA BRYANT DANN LAW FIRM By:/s/ Marc E. Dann Marc E. Dann, Esq. Ohio Bar No. 44115 (admitted pro h 2728 Euclid Avenue, STE 300 Cleveland, OH 44115 Counsel for Plaintiff Lisa A. Bryant	By: /s/Nicholas M. Porras NICHOLAS M. PORRAS, ESQ. Nevada Bar No.: 12849 201 West Liberty Street, Suite 207 Reno, NV 89501 Attorney for Defendants MADISON MANAGEMENT SERVICES, LLC, WALDMAN AND PORRAS, PLLC ac)
22 23		IT IS SO ORDERED
24		
25		ffr-
26		UNITED STATES DISTRICT JUDGE
27 28		Dated: May 13, 2022
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